

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

**FILED**  
**DEC 14 2021**  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
CLEVELAND

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL KLEINSCHMIDT,

Defendant.

) INDICTMENT

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CASE NO.

Title 18, United States Code,  
Sections 2252(a)(2), 2252(a)(1),  
and 2252A(a)(5)(B)

**1 : 21 CR**

**865**

COUNT 1

(Receipt of Visual Depictions of Real Minors Engaged In Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(2))

The Grand Jury charges:

1. From on or about October 1, 2018, through on or about October 28, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MICHAEL KLEINSCHMIDT did knowingly receive, using any means and facility of interstate and foreign commerce, numerous computer files, which files contained visual depictions of real minors engaged in sexually explicit conduct, and which files had been shipped and transported in and affecting interstate and foreign commerce, as defined in Title 18, United States Code, Section 2256(2), in violation of Title 18, United States Code, Section 2252(a)(2).

COUNT 2

(Transportation of Visual Depictions of Minors Engaged in Sexually Explicit Conduct, 18 U.S.C. § 2252(a)(1))

The Grand Jury further charges:

2. From on or about August 10, 2021, through on or about October 23, 2021, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant MICHAEL

KLEINSCHMIDT did knowingly transport child pornography, that is, visual depictions of a minor engaged in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), using any means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252(a)(1).

COUNT 3

(Possession of Child Pornography, 18 U.S.C. § 2252A(a)(5)(B))

The Grand Jury further charges:

3. On or about October 28, 2021, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL KLEINSCHMIDT did knowingly possess a Samsung cell phone, a Western Digital 1 TB external hard drive, a desktop computer containing a Western Digital 500 GB SATA hard drive and a Samsung 250 GB SSD, and a Western Digital 320 GB SATA hard drive, that contained child pornography as defined in Title 18, United States Code, Section 2256(8), which child pornography had been shipped and transported in interstate and foreign commerce by any means, including by computer, and which was produced using materials which had been shipped and transported in interstate and foreign commerce by any means, including by computer, and at least one image involved in the offense involved a prepubescent minor or a minor who had not attained 12 years of age, in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.